

COREY B. BECK, ESQ.
 Nevada Bar No. 005870
 LAW OFFICE OF COREY B. BECK, P.C.
 425 South Sixth Street
 Las Vegas, Nevada 89101
 Ph.: (702) 678-1999
 Fax: (702) 678-6788
 becksbk@yahoo.com

Attorney for Debtor

UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In Re:)	BK-S-19-16636-MKN
)	Chapter 11
CENSO, LLC.)	
)	
)	HEARING DATE: February 12, 2020
Debtor.)	HEARING TIME: 9:30 AM
)	

AMENDED MOTION TO EXTEND EXCLUSIVITY PERIOD
PURSUANT TO 11 U.S.C. §105(a) AND §1121(d)

Censo, LLC., (Debtor) respectfully requests this Court approve a 120-day extension of the Debtor's 120-day exclusivity period under 11 U.S.C. §1121(b) to file a Disclosure Statement and Reorganization Plan. This Motion is made and based on 11 U.S.C. §105(a) and 1121(d), the papers and pleadings on file herein, and any argument of counsel presented at any hearing held in respect to this application.

I.

STATEMENT OF FACT

1. On or about October 11, 2019, the Debtors filed a petition under Chapter 11 of the Bankruptcy Code (11 USC) in the above captioned case.
2. The Debtor's continued §341 Meeting of Creditors was rescheduled to December 5, 2019 at 2:00 PM.
3. The 120-day exclusivity period to file a Disclosure Statement and Reorganization Plan will expire on February 10, 2020. This extension will allow undersigned counsel and the Debtor to complete further investigation and gather information. Such extension would provide the Debtor until approximately until June 2, 2020

1 to file its Disclosure Statement and Reorganization Plan.

2 4. Application to Employ Nunc Pro Tunc was heard on January 8, 2020. Application
3 was approved - undersigned counsel is submitting order which indicates that there
4 are no contacts with employees of the U.S. Trustee.

5 5. Chapter 11 Plan is for propose of reorganizing 3 investment properties; 1161 Dana
6 Maple Court, 5900 Negril Avenue, and 11441 Allerton Park Dr. # 411.

7 6. Properties were obtained at HOA foreclosure sales.

8 7. State court litigation has been completed. Debtor is proper owner of properties
9 therefore, they are subject to mortgages.

10 8. Undersigned counsel has just received appraisals to file and obtain orders valuing
11 investment properties.

12 9. In addition, undersigned counsel has researched filing an adversary action on
13 Green Tree Servicing. The property may well be unsecured. ie description and
14 property address is incorrect on Deed of Trust securing said property.

15 10. Debtor believes in good faith that the extension is necessary and proper to obtain
16 order valuing investment properties. Debtor will also determine if adversary
17 action as to Green Tree Servicing is appropriate. Finally, undersigned counsel
18 will also seek agreements with secured creditors along with a vote for the plan.

19 11. Debtor believes in good faith that this extension is necessary and proper for the
20 successful progress of this case and is in the best interests of creditors.

21 II.

22 STATEMENT OF LAW

23 This Court has authority pursuant to 11 U.S.C. §105 and 1121(d) to grant a request of a
24 party in interest, that is made within the exclusivity period, to extend the exclusivity of the
25 Debtor for up to 18 months after the date of the order for relief. The Debtor is not seeking a
26 significant extension of time. The Debtor's initial 120-day period is only being extended by 120
27 days. Debtor has been working on preparation of the Disclosure Statement and Reorganization
28 Plan.

1 Extension will allow Debtor to gather necessary information. In addition, it is appropriate
2 to discuss options available in this case.

3 WHEREFORE, Debtors respectfully request that the Court approve the requested
4 extension of the Debtor's exclusivity period by 120-days to June 8, 2020, to necessary file
5 Disclosure Statement and Plan.

6 DATED this 3rd day of February, 2020.

7 Respectfully submitted,

8 /s/ COREY B. BECK
9 COREY B. BECK, ESQ.
10 Nevada Bar No. 005870
LAW OFFICE OF COREY B. BECK, P.C.
425 South Sixth Street
Las Vegas, Nevada 89101
11 Ph.: (702) 678-1999
12 Fax: (702) 678-6788
becksbk@yahoo.com

13 Attorney for Debtor
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